



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

DEC 14 2009

Charles H. Stagg  
Chief, Environmental and Natural  
Resources Management Division  
Directorate of Public Works  
Fort Polk, Louisiana 71459

Dear Mr. Stagg:

In accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act (NEPA), and the Council on Environmental Quality Regulations (CEQ) for Implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the Draft Environmental Impact Statement (DEIS) for the Joint Readiness Training Center and Fort Polk Land Acquisition Program, Purchase and Lease Lands for Training and Management Activities, in the Parishes of Vernon, Sabine, Natchitoches, Louisiana. The additional land would be used to support maneuver training and would be placed under Army land management.

EPA classified your DEIS and proposed action as "LO," i.e., EPA has "**Lack of Objections**". EPA has comments to offer on wetlands. We ask that these comments be addressed and responded to in the Final EIS. Our enclosed detailed comments are offered to complement and to more fully insure compliance with the requirements of NEPA.

Our classification will be published in the Federal Register according to our responsibility under Section 309 of the Clean Air Act, to inform the public of our views on proposed Federal actions. If you have any questions, please contact Michael Jansky of my staff at 214-665-7451 or by e-mail at [jansky.michael@epa.gov](mailto:jansky.michael@epa.gov) for assistance.

We appreciate the opportunity to review the DEIS. Please send our office one (1) copy of the FEIS at the same time that it is sent to the Office of Federal Activities (2251A), EPA, 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20044.

Sincerely yours,

A handwritten signature in cursive script, reading "Cathy Gilmore", is written over a horizontal line.

Cathy Gilmore, Chief  
Office of Planning and  
Coordination (6EN-XP)

Enclosure

**DETAILED COMMENTS  
ON THE  
DRAFT ENVIRONMENTAL IMPACT STATEMENT  
FOR THE  
JOIN READINESS TRAINING CENTER AND FORT POLK LAND  
ACQUISITION PROGRAM**

The document appears well written and addresses our concerns from a wetlands prospective. Three alternatives are being proposed, all containing the same type habitat with the same type wetland impacts. Stream impacts would occur via water crossings, however, the use of BMPs would aid in reducing impacts, e.g., erosion. Impacts would be minimized, then mitigated for any remaining impacts. Also, water crossings would be constructed to allow floodwaters to flow unconstrained across the stream's floodplain thus allowing sediments to deposit as they would naturally and fish passage would be encouraged. A Watershed Management Plan would be developed and implemented as well as a Mitigation and Monitoring Plan.

On page 180, Compensatory Mitigation was discussed. We recommend that in considering mitigation, the April 10, 2008, "Compensatory Mitigation for Losses of Aquatic Resources; Final Rule" be applied. While various types of compensatory mitigation were provided, the Rule lists the Preference Hierarchy for Mitigation; 1) mitigation bank credits, 2) in-lieu fee program credits, 3) permittee-responsible mitigation under a watershed approach, 4) on-site and /or in-kind permittee-responsible mitigation, and 5) off-site and/or out-of-kind permittee-responsible mitigation.

The mitigation ratio was also discussed on page 180. As stated in the document, to achieve a "no net loss of values" a minimum of one-to-one acreage replacement would be required. This ratio could be greater if the functional values of the impacted wetland were higher than the compensatory area. If functional values of the wetland to be impacted were lower, the ratio may be less than one-to-one. As the Rule provides for General Mitigation Requirements, the amount of compensation is a one-to-one minimum.

Thanks for the opportunity to review the document and provide comments. If you need further assistance, please contact Tamara Mick of the US EPA Region 6 ,Wetlands Section at 214-665-7134.